

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA
ERIE DIVISION**

NANCY STEVENSON,

Plaintiff,

V.

BEVERLY ENTERPRISES-
PENNSYLVANIA, INC d/b/a
BEVERLY HEALTHCARE-OIL CITY,

Defendant.

CASE NO. CA-05-184-SJM

Judge Sean J. McLaughlin

MOTION FOR ADMISSION
PRO HAC VICE OF STEPHANIE BAUER DANIEL

Pursuant to Rule 83.2.1 of the Local Civil Rules of Court for the Western District of Pennsylvania, Defendant Beverly Healthcare - Pennsylvania, Inc. d/b/a Beverly Healthcare - Oil City, by its counsel, respectfully requests that this Court grant Stephanie Bauer Daniel leave to appear *pro hac vice* for Defendant in this Action. In support of this motion, Defendant states as follows:

1. Stephanie Bauer Daniel is an Associate in the law firm of Dinsmore & Shohl LLP, 1900 Chemed Center, 255 East Fifth Street, Cincinnati, Ohio 45202, (513) 977-8200. Ms. Daniel is a member in good standing of the Bar of the State of Ohio. She is also admitted to practice before the Supreme Court of Georgia, the State Bar of Tennessee, the Court of Appeals for the Sixth Circuit, and the United States District Court for the Northern District of Georgia.

2. If admitted to practice before this Court *pro hac vice*, Ms. Daniel will abide by the rules of this Court, be subject to the full disciplinary powers of this Court and be available for all Court conferences, motions and trial dates as required, as well as local counsel below.

3. No previous request has been made for the relief requested herein.

4. As evidenced by her signature below and her Affidavit, Ms. Daniel has taken the oath set forth in Local Rule 83.2.1.D.

WHEREFORE, by the undersigned attorney, Defendant respectfully requests that this Honorable Court grant Stephanie Bauer Daniel leave to appear *pro hac vice* as counsel for Defendant in the above-captioned matter.

Respectfully submitted on this 23rd day of November, 2005,

s/Charles M. Roesch
Charles M. Roesch
DINSMORE & SHOHL LLP
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ORDER OF COURT

AND NOW, this _____ day of _____, 2005, upon
consideration of the foregoing MOTION FOR ADMISSION *PRO HAC VICE* OF STEPHANIE
BAUER DANIEL, said motion is hereby GRANTED.

U.S. District Court Judge

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AFFIDAVIT OF STEPHANIE BAUER DANIEL

STATE OF OHIO)
) SS.
COUNTY OF HAMILTON)

Now comes Stephanie Bauer Daniel, being first duly sworn, who deposes and states as follows:

1. I am an Associate in the law firm of Dinsmore & Shohl LLP. My office is located at 1900 Chemed Center, 255 East Fifth Street, Cincinnati, Ohio 45202.

2. I am a member in good standing of the Bar of the State of Ohio and have been admitted to practice before the Supreme Court of Georgia, the State Bar of Tennessee, the Court of Appeals for the Sixth Circuit, and the United States District Court for the Northern District of Georgia. I submit to the jurisdiction of this Court for all purposes and certify that I will strictly adhere to the Federal Rules of Civil Procedure and the Local Rules for the Western District of Pennsylvania.

3. I represent that I have never been the subject of any disciplinary action by any court or in any jurisdiction.

4. I make this Affidavit requesting permission of this Court to appear and participate as counsel, *pro hac vice*, in the above-captioned matter.

5. Pursuant to Local Rules of Civil Procedure 83.2.1.D, I hereby make the following oath: I do solemnly swear (or affirm) that I will demean myself as an attorney and counselor of this Court, uprightly and according to law; and that I will support the constitution of the United States. So help me God.

6. Counsel of record for Defendant is Charles M. Roesch, a member of the Bar of the United States District Court for the Western District of Pennsylvania. All pleadings, motions, notices, and other papers may be served on Charles M. Roesch of Dinsmore & Shohl LLP. Mr. Roesch's offices are located at 1900 Chemed Center, 255 East Fifth Street, Cincinnati, Ohio 45202 or electronically via the following email address: croesch@dinslaw.com.

7. Accordingly, it is respectfully requested that this Court enter an Order permitting Stephanie Bauer Daniel to appear and participate as counsel, *pro hac vice*, in the above-captioned matter.

FURTHER AFFIANT SAYETH NOT.



Sworn to and subscribed before me,

this the 23 day of Nov., 2005.

Notary Public

GARY E. BUCKER, Attorney at Law
Notary Public, State of Ohio
My Commission Expires 12/31/2006

My Commission Expires: _____